

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

CASE NO.: 22-CR-20104

MARIO ANTONIO PALACIOS PALACIOS  
Defendant.

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**SENTENCING MEMORANDUM**

Defendant Mario Antonio Palacios Palacios (“Palacios”) is being sentenced upon his adjudication of guilty to Conspiracy to provide material support or resources to carry out a violation of Title 18, United States Code, Section 956(a)(1), resulting in death, 18 United States Code, Section 2339A(a), Providing material support or resources to carry out a violation of Section 956(a)(a), resulting in death, 18 United States Code, Section 2339A(a), and Conspiracy to kill or kidnap a person outside of the United States, in violation of 18 United States Code, Section 956(a)(1).

**POST-BOOKER 3553(a) SENTENCING CONSIDERATIONS**

Palacios's Personal Characteristics

Palacios is currently 45 years old. He was born and raised in Choco, Colombia by his paternal grandparents in a humble household with no running water or electricity. Palacios attended high school and later became a soldier for the Colombian Army. He was a soldier in the Colombian Army for 20 years until he retired in December of 2019. After his retirement he began to work repairing air conditioners. He is currently married to his wife and together they have 3 children.

Reflect the Seriousness of the Offense, to Promote Respect for the Law, and to Provide Just Punishment for the Offense

Although this is a serious offense and Palacios should be punished for what he did, a guideline sentence does not necessarily equate to a sentence that adequately reflects Palacios's personal characteristics. A guideline sentence in this case for Palacios, when taking into account all other factors is excessively harsh for such a crime and an individual such as Palacios. Palacios understands and has admitted that his conduct is unacceptable and understands that he deserves to be punished.

The Need to Avoid Unwarranted Sentence Disparity

Palacios deserves to be punished for his actions but should be punished proportionately with his conduct taking into account the punishment received by other individuals in his same position.

To Afford Adequate Deterrence of Criminal Conduct

Palacios should be sentenced to a sentence that sends a message to individuals who transgress society's laws, and demonstrates that this conduct will not be tolerated, while at the same time complying with the mandate that the sentence should be sufficient, but not greater than necessary to accomplish the objectives established by 18 U.S.C. § 3553.

To Protect the Public from Further Crimes of the Defendant

This is a significant factor in imposing sentence. Palacios has never had contact with law enforcement before this case. With the exception of the conduct in this case Palacios has always been a hard-working law-abiding citizen. He has a supportive family, has learned from his mistakes, and is not likely to continue to commit crimes.

**CONCLUSION**

For all of the above reasons, this Court should impose upon Palacios a sentence minimally sufficient to achieve the statutory purpose of punishment considering all the above-mentioned factors.

Respectfully submitted,

/s/Alfredo A. Izaguirre  
Alfredo A. Izaguirre, Esq.  
338 Minorca Ave.  
Coral Gables, FL 33134  
Tel:(305)442-0425  
Fax:(305)442-0429  
FL Bar# 13556

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 23, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all parties.

/s/Alfredo A. Izaguirre  
Alfredo A. Izaguirre, Esq.